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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 14-0102 CRB
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER TO
)	CONTINUE SENTENCING
v.)	
)	
REYNOLDO VARGAS,)	
)	
Defendant.)	
)	

The parties stipulate and agree as follows:

1. The sentencing of defendant Reynaldo Vargas is scheduled for May 6, 2015.
2. Because of delays in and unexpected proceedings related to co-defendants Furminger and Robles, the parties were unable to complete their analysis of defendant Vargas's sentence, in particular the anticipated requested downward departure motion pursuant to U.S.S.G. 5K1.1.
3. The parties, accordingly, request a continuance of the sentencing hearing three weeks, to May 20, 2015, at 2:00 pm. The parties will file sentencing memoranda on or before May 14, 2015.

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1 4. This is the parties' first request for a continuance.

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3 SO STIPULATED AND AGREED

4
5 Respectfully submitted,

6 MELINDA HAAG
7 United States Attorney

8 *John H. Hemann*

9 Dated: April 30, 2015

10 _____
11 JOHN H. HEMANN
12 Assistant United States Attorney

13 Dated: April 30, 2015

14 _____
15 /s/ Harry Stern
16 HARRY STERN
17 Attorney for Reynaldo Vargas

18 IT IS SO ORDERED.

19 DATED _____

20 _____
21 CHARLES R. BREYER
22 United States District Judge